EXHIBIT 11

PRELIMINARY STATEMENT

Pursuant to Federal Rules of Civil Procedure 26(a)(1), Defendants Uber Technologies, Inc. ("Uber") and Ottomotto LLC ("Ottomotto") (collectively, "Defendants") hereby amend and supplement its initial disclosures to Plaintiff Waymo LLC.

Defendants provide these disclosures subject to and without waiving any applicable privilege, doctrine, or right, including without limitation the attorney-client privilege, the joint defense/common interest privilege, the work product doctrine, and all other rights and privileges recognized under the laws of the United States, the State of California, and all relevant jurisdictions. By these disclosures, Defendants do not concede the relevance or admissibility of any particular information. Defendants make these disclosures based on information currently available to them. Defendants reserve the right to amend or supplement these disclosures and to present additional evidence to support their defenses with any filing or during any proceeding in this action, including trial, in accordance with the Court's Case Management Order (Dkt. 562).

A. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION [Fed. R. Civ. P. 26(a)(1)(A)(i)]

Defendants identify the following individuals who may have discoverable information that Defendants may use to support their defenses in this case. Waymo¹ should contact any current or former employee, agent, or other representative of Defendants only through Defendants' counsel of record, unless otherwise specified. Additionally, individuals described as having knowledge of the "Stroz due diligence for the Uber/Ottomotto acquisition" are noted with an asterisk (*) because these individuals would be used to support Defendants' defenses in this case, or would testify about that subject, if and only if that subject is found not to be privileged.

¹ "Waymo" refers to Waymo LLC (previously Project Chauffeur), Google Inc., and Alphabet Inc.

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1	Persons	Address	Knowledge
2	Travis Kalanick	[Contact through counsel of record]	Defendants' business model
3		Uber Technologies, Inc.	and strategy for autonomous vehicles; Defendants' non-
4		1455 Market Street, Floor 4	misappropriation of Waymo's trade secrets;
5		San Francisco, CA 94103	Uber's decision to acquire Ottomotto; steps taken by
6			Defendants to prevent trade secrets from prior employers
7			coming to Defendants; Defendants' autonomous
8			vehicle program; March 11, 2016 meeting
9			with Anthony Levandowski; knowledge of Waymo's
10			discussions with Defendants regarding a partnership with
11			Defendants in the self- driving vehicle/ride-sharing
12			space; Defendants' employment of Anthony
13			Levandowski; Defendants' termination of Anthony
14	I CCII 11		Levandowski
15	Jeff Holden	[Contact through counsel of record]	Defendants' business model and strategy for autonomous
16		Uber Technologies, Inc. 1455 Market Street, Floor 4	vehicles; Defendants' autonomous vehicle
17		San Francisco, CA 94103	program; Uber's decision to acquire Ottomotto;
18			confirmation of the absence of evidence of trade secret
19			misappropriation through and during compliance with
20			the Court's provisional remedy order
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1	Persons	Address	Knowledge
2	Anthony Levandowski	Contact Mr. Levandowski's counsel:	Nature of employment at Waymo and Defendants;
3		Ismail Ramsey or Miles Ehrlich	design and development of Defendants' LiDAR;
4		Ramsey & Ehrlich LLP 803 Hearst Avenue	Defendants' autonomous vehicle program;
5		Berkeley, CA 94710	Defendants non- misappropriation of
6			Waymo's trade secrets; the inventions disclosed and
7			claimed in the '922 and '464 patents, including
8			conception and reduction to practice; the preparation and
9 10			filing of the '922 and '464 patents; business of Otto Trucking LLC;
11			knowledge of Odin Wave LLC and Tyto
12			LiDAR LLC, Waymo's employee policies
13			concerning confidential and trade secret information,
14			including with respect to hardware; knowledge of the
15			Project Chauffeur bonus program; March 11, 2016 meeting with Anthony
16 17			Levandowski; Stroz due diligence for the Uber/Ottomotto acquisition*
18	Radu Raduta	Contact Mr. Raduta's counsel:	Nature of employment at Waymo and Defendants;
19		Mary McNamara	Defendants' non- misappropriation of
20		Swanson & McNamara LLP 300 Montgomery Street, Suite 1100	Waymo's trade secrets
21		San Francisco, CA 94104	
22		Phone: (415) 477-3800 Fax: (415) 477-9010	
23		Email: mary@smllp.law	
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1	Persons	Address	Knowledge
2	Sameer Kshirsagar	Contact Mr. Kshirsagar's counsel:	Nature of employment at Waymo and Defendants;
3		Mark Punzalan	Defendants' non-
4		Punzalan Law, P.C.	misappropriation of Waymo's trade secrets
5		600 Allerton Street, Suite 201	
3		Redwood City, CA 94063 Phone: (650) 481-8112	
6		Fax: (650) 362-4151	
7		Email: markp@punzalanlaw.com	
8	James Haslim	[Contact through counsel of record]	Design and development of Defendants' LiDAR;
9		Uber Technologies, Inc.	Defendants' non- misappropriation of
10		1455 Market Street, Floor 4 San Francisco, CA 94103	Waymo's trade secrets; knowledge of Odin
11			Wave LLC and Tyto LiDAR LLC; confirmation of the absence of evidence of
12			trade secret misappropriation through and during
13 14			compliance with the Court's provisional remedy order
15	Adam Kenvarg	[Contact through counsel of record]	Design and development of Defendants' LiDAR;
16		Uber Technologies, Inc.	Defendants' non- misappropriation of
17		1455 Market Street, Floor 4 San Francisco, CA 94103	Waymo's trade secrets; confirmation of the absence
18			of evidence of trade secret misappropriation through
19			and during compliance with the Court's provisional remedy order; inspection
20			pursuant to the Court's provisional remedy order
21	William Treichler	[Contact through counsel of record]	Design and development of Defendants' LiDAR;
22		Uber Technologies, Inc.	Defendants' non-
23		1455 Market Street, Floor 4	misappropriation of Waymo's trade secrets;
24		San Francisco, CA 94103	confirmation of the absence of evidence of trade secret
25			misappropriation through and during compliance with
26			the Court's provisional remedy order
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1	Persons	Address	Knowledge
2 3 4 5 6 7	Florin Ignatescu	[Contact through counsel of record] Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Design and development of Defendants' LiDAR; Defendants' non-misappropriation of Waymo's trade secrets; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order
8	Gaetan Pennecot	[Contact through counsel of record]	Design and development of Defendants' LiDAR;
9		Uber Technologies, Inc.	Defendants' non-misappropriation of
10		1455 Market Street, Floor 4 San Francisco, CA 94103	Waymo's trade secrets; the inventions disclosed and
11		,	claimed in the '922 and '464 patents, including
12			conception and reduction to practice; the preparation and
13			filing of the '922 and '464 patents; nature of
14			employment at Waymo; Waymo's employee policies
15			concerning confidential and trade secret information,
16			including with respect to hardware; knowledge of the
17			Project Chauffeur bonus program; confirmation of the
18			absence of evidence of trade secret misappropriation
19			through and during compliance with the Court's
20			provisional remedy order
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1	Persons	Address	Knowledge
2	Daniel Gruver	[Contact through counsel of record]	Design and development of
3			Defendants' LiDAR; Defendants' non-
		Uber Technologies, Inc. 1455 Market Street, Floor 4	misappropriation of Waymo's trade secrets; the
4 5		San Francisco, CA 94103	inventions disclosed and claimed in the '922 and
6			'464 patents, including conception and reduction to
7			practice; the preparation and filing of the '922 and
8			'464 patents; nature of employment at Waymo;
9			Waymo's employee policies concerning confidential and trade secret information,
10			including with respect to hardware; knowledge of the
11			Project Chauffeur bonus program; confirmation of the
12			absence of evidence of trade secret misappropriation
13			through and during compliance with the Court's
14			provisional remedy order
15	Scott Boehmke	[Contact through counsel of record]	Design and development of Defendants' LiDAR; Defendants' non-
16		Uber Technologies, Inc. Advanced Technologies Center	misappropriation of Waymo's trade secrets;
17 18		100 32nd St, Pittsburgh, PA 15201	inspection pursuant to the Court's provisional remedy
19			order; confirmation of the absence of evidence of trade
20			secret misappropriation through and during
21			compliance with the Court's provisional remedy order
22	Jim Gasbarro	[Contact through counsel of record]	Design and development of Defendants' LiDAR;
23		Uber Technologies, Inc.	Defendants' non- misappropriation of
24		Advanced Technologies Center 100 32nd St, Pittsburgh, PA 15201	Waymo's trade secrets; confirmation of the absence
25		100 32nd 5t, 1 msourgh, 171 13201	of evidence of trade secret misappropriation through
26			and during compliance with the Court's provisional
27			remedy order
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	DEFENDANTS' LIDED TECH	INOLOGIES INC. AND OTTOMOTTO LLC'S AMENDED IN	MENTAL DISCHOSHING

1	Persons	Address	Knowledge
2 3 4 5 6	Robert Doll	[Contact through counsel of record] Uber Technologies, Inc. Advanced Technologies Center 100 32nd St, Pittsburgh, PA 15201	Design and development of Defendants' LiDAR; Defendants' non-misappropriation of Waymo's trade secrets; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional
7			remedy order
8	Eric Meyhofer	[Contact through counsel of record] Uber Technologies, Inc.	Design and development of Defendants' LiDAR; Defendants' autonomous
10		Advanced Technologies Center 100 32nd St, Pittsburgh, PA 15201	vehicle program; Defendants' non- misappropriation of
11			Waymo's trade secrets; Defendants' business model and strategy for autonomous
12 13			vehicles; Uber's decision to acquire Ottomotto; termination of Anthony
14			Levandowski; confirmation of the absence of evidence of
15			trade secret misappropriation through and during compliance with the Court's
16			provisional remedy order
17	John Bares	[Contact through counsel of record]	Design and development of Defendants' LiDAR;
18 19		Uber Technologies, Inc. Advanced Technologies Center	Defendants' autonomous vehicle program; Defendants' non-
20		100 32nd St, Pittsburgh, PA 15201	misappropriation of Waymo's trade secrets;
21			Defendants' business model and strategy for autonomous vehicles; Uber's decision to
22			acquire Ottomotto; steps taken by Defendants to
23			prevent trade secrets from prior employers of
24			Defendants' employees coming to Defendants;
25			confirmation of the absence of evidence of trade secret misappropriation through
2627			and during compliance with the Court's provisional
28			remedy order

1	Persons	Address	Knowledge
2 3 4 5 6 7 8 9	Asheem Linaval	[Contact through counsel of record] Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Design and development of Defendants' LiDAR; Defendants' non-misappropriation of Waymo's trade secrets; Waymo's policies as it relates to contractors concerning confidential and trade secret information; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order
10 11 12	Michael Karasoff	[Contact through counsel of record] Uber Technologies, Inc. 1455 Market Street, Floor 4	Design and development of Defendants' LiDAR; Defendants' non- misappropriation of Waymo's trade secrets;
13 14 15 16		San Francisco, CA 94103	knowledge of Odin Wave LLC and Tyto LiDAR LLC; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order
17 18 19 20 21	Matthew Palomar	[Contact through counsel of record] Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Design and development of Defendants' LiDAR; Defendants' non-misappropriation of Waymo's trade secrets; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order
22 23 24 25 26 27 28	Daniel Ratner	[Contact through counsel of record] Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Design and development of Defendants' LiDAR; Defendants' non-misappropriation of Waymo's trade secrets; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order

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Persons	Address	Knowledge
Max Levandowski	[Contact through counsel of record] Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Design and development of Defendants' LiDAR; Defendants' non-misappropriation of Waymo's trade secrets; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order
George Lagui	[Contact through counsel of record] Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Design and development of Defendants' LiDAR; Defendants' non-misappropriation of Waymo's trade secrets; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order

Defendants' Uber Technologies, Inc. and Ottomotto LLC's Amended Initial Disclosures Case No. 3:17-cv-00939-WHA sf-3750758

1	Persons	Address	Knowledge
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Lior Ron	[Contact through counsel of record] Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Nature of employment at Waymo and Defendants; Anthony Levandowski's departure from Waymo; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski; knowledge of the Project Chauffeur bonus program; steps taken by Defendants to prevent trade secrets from prior employers of Defendants' employees coming to Defendants; Defendants' non- misappropriation of Waymo's trade secrets; formation, purpose, and business of Otto Trucking LLC; formation, purpose, and business of Ottomotto; Ottomotto's decision to be acquired by Uber; March 11, 2016 meeting with Anthony Levandowski; Stroz due diligence for the Uber/Ottomotto acquisition*; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional
21	Drant Cabyyara	[Contact through council of record]	remedy order
22	Brent Schwarz	[Contact through counsel of record]	Defendants' non- misappropriation of Waymo's trade secrets;
23		Uber Technologies, Inc. 1455 Market Street, Floor 4	knowledge of Odin Wave LLC and Tyto LiDAR LLC;
24		San Francisco, CA 94103	confirmation of the absence of evidence of trade secret
2526			misappropriation through and during compliance with the Court's provisional remedy order
27			remedy order
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1	Persons	Address	Knowledge
2	Cameron Poetzscher	[Contact through counsel of record]	Defendants' non-
3		Uber Technologies, Inc.	misappropriation of Waymo's trade secrets;
4		1455 Market Street, Floor 4	business of Otto Trucking LLC; Uber's
5		San Francisco, CA 94103	decision to acquire Ottomotto; March 11, 2016
6			meeting with Anthony Levandowski; Stroz due diligence for the
7			Uber/Ottomotto acquisition*; confirmation of the absence
8			of evidence of trade secret misappropriation through
9			and during compliance with the Court's provisional remedy order
11	Nina Qi	[Contact through counsel of record]	Defendants' non- misappropriation of
12		Uber Technologies, Inc.	Waymo's trade secrets; business of Otto
13		1455 Market Street, Floor 4 San Francisco, CA 94103	Trucking LLC; Uber's decision to acquire
14		Suil Fulleisco, Cri y 1103	Ottomotto; March 11, 2016 meeting with Anthony
15			Levandowski; confirmation of the absence of evidence of
16			trade secret misappropriation through and during
17			compliance with the Court's provisional remedy order
18	Adam Bentley	[Contact through counsel of record]	Formation, purpose, and business of Otto
19		Uber Technologies, Inc.	Trucking LLC; formation, purpose, and business of
20		1455 Market Street, Floor 4 San Francisco, CA 94103	Ottomotto; Ottomotto's decision to be acquired by
21		San Francisco, CA 74103	Defendants and structure of the acquisition; knowledge
22			of Odin Wave LLC and Tyto LiDAR LLC; submissions to
23			the Nevada Department of Motor Vehicles; Stroz due
24			diligence for the Uber/Ottomotto acquisition*;
25			confirmation of the absence of evidence of trade secret
26			misappropriation through
27			and during compliance with the Court's provisional remedy order
28			remedy order

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¹ ∥	Persons	Address	Knowledge
2 3 4 5 6	Ognen Stojanovski	[Contact through counsel of record] Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Knowledge of Odin Wave LLC, Tyto LiDAR LLC, and Sandstone Group LLC; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order
7 8 9 10 11 12 13	Rhian Morgan	[Contact through counsel of record] Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Hiring and onboarding process for Ottomotto, including hiring agreements; steps taken by Defendants to prevent trade secrets from prior employers of Defendants' employees coming to Defendants; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order

Defendants' Uber Technologies, Inc. and Ottomotto LLC's Amended Initial Disclosures Case No. 3:17-cv-00939-WHA sf-3:750758

1	Persons	Address	Knowledge
2	Don Burnette	[Contact through counsel of record]	Nature of employment at
3		Liber Technologies Inc	Waymo and Defendants; Defendants' non-
4		Uber Technologies, Inc. 1455 Market Street, Floor 4	misappropriation of Waymo's trade secrets;
5		San Francisco, CA 94103	formation, purpose, and business of Ottomotto;
6			Ottomotto's decision to be acquired by Defendants;
7			Development and operation of Waymo's autonomous vehicle program; Anthony
8			Levandowski's departure
9			from Waymo; Waymo's policies surrounding side projects and side businesses;
10			knowledge of Waymo employee involvement in
11			side projects and side businesses; knowledge of the
12			Project Chauffeur bonus program; Stroz due diligence
13			for the Uber/Ottomotto acquisition*; confirmation of
14			the absence of evidence of trade secret misappropriation
15			through and during compliance with the Court's
16	C I I 1		provisional remedy order
17	Soren Juelsgaard*	[Contact through counsel of record]	Stroz due diligence for the Uber/Ottomotto acquisition*; Defendants' non-
18		Uber Technologies, Inc. 1455 Market Street, Floor 4	misappropriation of
19		San Francisco, CA 94103	Waymo's trade secrets; confirmation of the absence
20			of evidence of trade secret misappropriation through
21			and during compliance with the Court's provisional
22	Colin Sebern*	[Contact through counsel of record]	remedy order Stroz due diligence for the
23			Uber/Ottomotto acquisition*; Defendants' non-
24		Uber Technologies, Inc. 1455 Market Street, Floor 4	misappropriation of Waymo's trade secrets;
25		San Francisco, CA 94103	confirmation of the absence of evidence of trade secret
26			misappropriation through and during compliance with
27			the Court's provisional remedy order
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1	Persons	Address	Knowledge
2	Brian McClendon	[Contact through counsel of record]	Development and operation
3		Uber Technologies, Inc.	of Waymo's autonomous vehicle program; Waymo's
4		1455 Market Street, Floor 4	employee policies concerning confidential and
5		San Francisco, CA 94103	trade secret information; Waymo's policies surrounding side projects and
6			side businesses; knowledge of Waymo employee
7			involvement in side projects and side businesses,
8			including that of Anthony Levandowski; knowledge of
9			the Project Chauffeur bonus program; introduction of Anthony Levandowski to
10 11			Defendants; confirmation of the absence of evidence of
12			trade secret misappropriation through and during
13			compliance with the Court's provisional remedy order
14	Justin Suhr	[Contact through counsel of record]	Stroz due diligence for the Uber/Ottomotto acquisition*; Uber's decision to acquire
15		Uber Technologies, Inc. 1455 Market Street, Floor 4	Ottomotto and structure of
16 17		San Francisco, CA 94103	the acquisition; confirmation of the absence of evidence of trade secret misappropriation
18			through and during compliance with the Court's provisional remedy order
19	Angela Padilla	[Contact through counsel of record]	Termination of Anthony Levandowski; Stroz due
20		Uber Technologies, Inc.	diligence for the Uber/Ottomotto acquisition*;
21		1455 Market Street, Floor 4 San Francisco, CA 94103	confirmation of the absence of evidence of trade secret misappropriation through
22 23			and during compliance with the Court's provisional
24			remedy order
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Persons	Address	Knowledge
Andrew Glickman	[Contact through counsel of record] Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Stroz due diligence for the Uber/Ottomotto acquisition* Uber's decision to acquire Ottomotto and structure of the acquisition; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order
Eric Friedberg*	Stroz Friedberg 32 Avenue of the Americas, Floor 4 New York, NY 10013 Phone: (212) 981-6540	Stroz due diligence for the Uber/Ottomotto acquisition
Mary Fulginiti*	Stroz Friedberg 1925 Century Park, East Suite 1350 Los Angeles, CA 90067 Phone: (310) 623-3300	Stroz due diligence for the Uber/Ottomotto acquisition
Judith Branham*	Stroz Friedberg 330 Second Avenue South, Suite 335 Minneapolis, MN 55401 Phone: (612) 605-3000	Stroz due diligence for the Uber/Ottomotto acquisition
Melanie Maugeri*	Stroz Friedberg 101 Montgomery Street, Suite 2200 San Francisco, CA 94104 Phone: (415) 671-4720	Stroz due diligence for the Uber/Ottomotto acquisition
Eric Amdursky*	[Contact through O'Melveny and Myers LLP General Counsel] Martin S. Checov O'Melveny & Myers LLP Two Embarcadero Center, 28th Floor San Francisco, CA 94111 Phone: (415) 984-8713	Stroz due diligence for the Uber/Ottomotto acquisition
Paul Sieben*	[Contact through O'Melveny and Myers LLP General Counsel] Martin S. Checov O'Melveny & Myers LLP Two Embarcadero Center, 28th Floor San Francisco, CA 94111 Phone: (415) 984-8713	Stroz due diligence for the Uber/Ottomotto acquisition

Persons	Address	Knowledge
Eric Tate† ²	Morrison & Foerster LLP 425 Market Street San Francisco, CA 94105 Phone: (415) 268-7000	Stroz due diligence for the Uber/Ottomotto acquisition*; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order
Rudy Kim†	Morrison & Foerster LLP 755 Page Mill Road Palo Alto, CA 94304 Phone: (650) 813-5600	Intellectual property due diligence for the Uber/Ottomotto acquisition*; inspection pursuant to the Court's provisional remedy order
Shouvik Biswas*†	Morrison & Foerster LLP 1650 Tysons Boulevard, Suite 400 McLean, VA 22102 Phone: (703) 760-7700	Intellectual property due diligence for the Uber/Ottomotto acquisition*
Wendy Ray†	Morrison & Foerster LLP 707 Wilshire Boulevard Los Angeles, CA 90017-3543 Phone: (213) 892-5200	Confirmation of the absence of evidence of trade secret misappropriation; inspection pursuant to the Court's provisional remedy order
Daniel Muino†	Morrison & Foerster LLP 2000 Pennsylvania Avenue, NW Suite 6000 Washington, D.C. 20006 Phone: (202) 887-1500	Inspection pursuant to the Court's provisional remedy order
Esther Kim Chang†	Morrison & Foerster LLP 425 Market Street San Francisco, CA 94105 Phone: (415) 268-7000	Inspection pursuant to the Court's provisional remedy order
Sylvia Rivera†	Morrison & Foerster LLP 707 Wilshire Boulevard Los Angeles, CA 90017-3543 Phone: (213) 892-5200	Confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order

² In view of the rapid pace of this litigation and the Court's order requiring initial disclosures by June 21, 2017, Defendants are listing certain outside counsel as potential witnesses out of an abundance of caution. Such outside counsel are indicated with †. Defendants expect to resolve, through resolution of pending privilege issues and discussions with opposing counsel and the Court, whether any of these potential witnesses will in fact be called as witnesses at trial.

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1	Persons	Address	Knowledge
2 3 4 5	Kevin Faulkner	Stroz Friedberg 32 Avenue of the Americas, Floor 4 New York, NY 10013 Phone: (212) 981-6540	Forensic examination of Uber-issued devices and data; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order
6 7 8 9 10 11	John Krafcik	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Development and operation of Waymo's autonomous vehicle program; Anthony Levandowski's departure from Waymo; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski;
12 13 14 15 16			Waymo's business plans; knowledge of discussions with Defendants regarding a partnership with Defendants in the self-driving vehicle/ride-sharing space; knowledge of the Project Chauffeur bonus program;
17 18 19 20 21 22 23 24	Pierre-Yves Droz	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Inventions disclosed and claimed in the '922, '464, and '936 patents, including conception and reduction to practice; the preparation and filing of the '922, '464, and '936 patents; Waymo's employee policies concerning confidential and trade secret information, including with respect to hardware; the design, development, and operation of Waymo's LiDAR systems, self-driving car project, and purported trade secrets.
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1	Persons	Address	Knowledge
2 3 4 5	William McCann	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Design, development, and operation of Waymo's LiDAR systems, self-driving car project, and purported trade secrets; Waymo's employee policies concerning confidential and trade secret information
6 7 8 9 10	Ben Ingram	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Design, development, and operation of Waymo's LiDAR systems, self-driving car project, and purported trade secrets; Waymo's employee policies concerning confidential and trade secret information
11 12 13 14	Bernard Fidric	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Design, development, and operation of Waymo's LiDAR systems, self-driving car project, and purported trade secrets; Waymo's employee policies concerning confidential and trade secret information
15 16 17 18	Luke Wachter	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Design, development, and operation of Waymo's LiDAR systems, self-driving car project, and purported trade secrets; Waymo's employee policies concerning confidential and trade secret information
19 20 21 22 23 24 25 26 27	Dmitri Dolgov	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Design, development, and operation of Waymo's LiDAR systems, self-driving car project, and purported trade secrets; Waymo's employee policies concerning confidential and trade secret information; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski

1	Persons	Address	Knowledge
2 3 4 5 6 7 8 9	Nathaniel Fairfield	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Design, development, and operation of Waymo's LiDAR systems, self-driving car project, and purported trade secrets; Waymo's employee policies concerning confidential and trade secret information; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski
10 11 12 13 14 15 16 17	Andrew Chatham	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Design, development, and operation of Waymo's LiDAR systems, self-driving car project, and purported trade secrets; Waymo's employee policies concerning confidential and trade secret information; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski
18 19 20 21 22	Rahim Pardhan	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Design, development, and operation of Waymo's LiDAR systems, self-driving car project, and purported trade secrets; Waymo's employee policies concerning confidential and trade secret information
23 24 25 26 27	Blaise Gassend	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Design, development, and operation of Waymo's LiDAR systems, self-driving car project, and purported trade secrets; Waymo's employee policies concerning confidential and trade secret information

1	Persons	Address	Knowledge
2	Mark Shand	Waymo LLC	Design, development, and
3		1600 Amphitheatre Parkway	operation of Waymo's LiDAR systems, self-driving
		Mountain View, CA 94043	car project, and purported trade secrets; Waymo's
4 5			employee policies concerning confidential and
6			trade secret information; Waymo's policies
7			surrounding side projects and side businesses; knowledge of Waymo employee
8			involvement in side projects and side businesses,
9			including that of Anthony Levandowski
10	Andrew Schultz	Waymo LLC 1600 Amphitheatre Parkway	Design, development, and operation of Waymo's
11 12		Mountain View, CA 94043	LiDAR systems, self-driving car project, and purported
13			trade secrets; Waymo's employee policies
14			concerning confidential and trade secret information
15	Ryan Andrade	Waymo LLC 1600 Amphitheatre Parkway	Design, development, and operation of Waymo's
16		Mountain View, CA 94043	LiDAR systems, self-driving car project, and purported
17			trade secrets; Waymo's employee policies
18			concerning confidential and trade secret information
19	Drew Ulrich	Waymo LLC 1600 Amphitheatre Parkway	Inventions disclosed and claimed in the '922 and
20		Mountain View, CA 94043	'464 patents, including conception and reduction to
21			practice; the preparation and filing of the '922 and
22			'464 patents; Waymo's employee policies
23 24			concerning confidential and trade secret information; the
25			design, development, and operation of Waymo's
26			LiDAR systems, self-driving car project, and purported trade secrets
27		1	

1	Persons	Address	Knowledge
2	Zachary Morris	Waymo LLC	Inventions disclosed and
3	Zachary Woms	1600 Amphitheatre Parkway Mountain View, CA 94043	claimed in the '922 and '464 patents, including
4		Wouldan View, C/1 74043	conception and reduction to practice; the preparation and
5			filing of the '922 and '464 patents; Waymo's employee policies
6			concerning confidential and trade secret information; the
7			design, development, and operation of Waymo's
8			LiDAR systems, self-driving car project, and purported
9	Samuel Lenius	Warma LLC	trade secrets Invention disclosed and
10	Samuel Lenius	Waymo LLC 1600 Amphitheatre Parkway	claimed in the '936 patent, including conception and
11 12		Mountain View, CA 94043	reduction to practice; the preparation and filing of the
13			⁵ 936 patent; Waymo ⁵ s employee policies concerning confidential and
14			trade secret information; the design, development, and
15			operation of Waymo's LiDAR systems, self-driving
16			car project, and purported trade secrets
17	Ionut Dorel Iordache	Waymo LLC 1600 Amphitheatre Parkway	Design, development, and operation of Waymo's
18		Mountain View, CA 94043	LiDAR systems, self-driving car project, and purported
19 20			trade secrets; Waymo's employee policies concerning confidential and
			trade secret information
21	Daniel Chu	Waymo LLC 1600 Amphitheatre Parkway	Estimates and forecasts of ride-sharing market and
22		Mountain View, CA 94043	Waymo's share of ride-
23		·	sharing market; Waymo's business and strategic plans
24			(and plans generally) for the
25			ride-sharing market, including projections for
26			revenue generation and profitability
27			

Persons	Address	Knowledge
Gerard Dwyer	Waymo LLC	Estimates and forecasts of
	1600 Amphitheatre Parkway	ride-sharing market and
	Mountain View, CA 94043	Waymo's share of ride-
		sharing market; Waymo's business and strategic plans
		(and plans generally) for th
		ride-sharing market,
		including projections for
		revenue generation and
		profitability
Jennifer Haroon	Waymo LLC	Estimates and forecasts of
	1600 Amphitheatre Parkway	ride-sharing market and Waymo's share of ride-
	Mountain View, CA 94043	sharing market; Waymo's
		business and strategic plans
		(and plans generally) for th
		ride-sharing market,
		including projections for
		revenue generation and
		profitability
Joanne Chin	Waymo LLC	Waymo's employee policie
	1600 Amphitheatre Parkway	concerning confidential and trade secret information;
	Mountain View, CA 94043	Waymo's policies
		surrounding side projects a
		side businesses; knowledge
		of Waymo employee
		involvement in side project
		and side businesses,
		including that of Anthony Levandowski
Gary Brown	Waymo LLC	Waymo's first awareness o
Jary Diowii	1600 Amphitheatre Parkway	alleged trade secret
	Mountain View, CA 94043	misappropriation; Waymo'
	1.104114111 11011, 011 77073	forensic investigation into
		alleged misappropriation o
		trade secret misappropriation
Michael Janosko	Waymo LLC	Waymo's measures to
	1600 Amphitheatre Parkway	protect the security of Waymo's confidential
	Mountain View, CA 94043	documents, servers, and
		SVN repository; Waymo's
		employee policies
		concerning confidential and
		trade secret information

Persons	Address	Knowledge
Kristinn Gudjonsson	Waymo LLC	Waymo's measures to
	1600 Amphitheatre Parkway	protect the security of Waymo's confidential
	Mountain View, CA 94043	documents, servers, and
		SVN repository; Waymo's employee policies
		concerning confidential and trade secret information;
		Waymo's forensic
		investigation into alleged
		misappropriation of trade
T. W.11.	W	secret misappropriation Waymo's supply chain
Tim Willis	Waymo LLC	operations; Waymo's
1	1600 Amphitheatre Parkway Mountain View, CA 94043	employee policies
	Woulden View, Cit 94045	concerning confidential and
		trade secret information
Sean Noyce	Waymo LLC	Waymo's supply chain operations; Waymo's
	1600 Amphitheatre Parkway Mountain View, CA 94043	employee policies
	Wouldam View, CA 94043	concerning confidential and trade secret information
Jai Krishnan	WaxmallC	
Jai Kiisiiiaii	Waymo LLC 1600 Amphitheatre Parkway	Waymo's supply chain operations; Waymo's
	Mountain View, CA 94043	employee policies
	, , , , , , , , , , , , , , , , , , , ,	concerning confidential and trade secret information
William Grossman	Waymo LLC	Waymo's knowledge of
William Grossman	1600 Amphitheatre Parkway	Defendants' LiDAR design
	Mountain View, CA 94043	Waymo's employee policie
	·	concerning confidential and
		trade secret information; Waymo's receipt of
		correspondence containing
		Defendants' LiDAR design
Ron Medford	Waymo LLC	Waymo's filings,
	1600 Amphitheatre Parkway	submissions, applications, c certifications made to public
	Mountain View, CA 94043	entities pertaining to its self
		driving cars and the use of
		lasers in autonomous
		vehicles

1	Persons	Address	Knowledge
2	Waymo Human	Waymo LLC	Waymo's policies
	Resources Manager	1600 Amphitheatre Parkway	concerning confidential and
3		Mountain View, CA 94043	trade secret information; Waymo employment and
4			compensation issues; Project
5	Cl. 1 . D. 1	W	Chauffeur bonus program Waymo's policies
6	Chelsea Bailey	Waymo LLC 1600 Amphitheatre Parkway	concerning confidential and
		Mountain View, CA 94043	trade secret information;
7			Waymo employment and compensation issues; Project
8			Chauffeur bonus program
9	Meiling Tan	Waymo LLC 1600 Amphitheatre Parkway	Marketing of Waymo's autonomous vehicle
10		Mountain View, CA 94043	program; Waymo's business plans; Waymo's strategy
11			regarding its business model
12			with respect to self-driving car technology; Waymo's
13			partnerships in the self- driving car space; Waymo's
14			business and strategic plans
15			(and plans generally) for the ride-sharing market,
16			including projections for revenue generation and
17		***	profitability
18	Individuals most knowledgeable about	Waymo LLC 1600 Amphitheatre Parkway	Development and operation of Waymo's autonomous
19	Waymo's business, confidentiality	Mountain View, CA 94043	vehicle program; Waymo's policies surrounding side
20	policies, self-driving vehicle program,		projects and side businesses; knowledge of Waymo
21	LiDAR systems, and employment and		employee involvement in side projects and side
22	compensation policies and		businesses, including that of Anthony Levandowski; the
23	practices		design, development, and operation of Waymo's LiDAR systems and
24			purported trade secrets
25			
26			
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1	Persons	Address	Knowledge
2 3 4 5 6 7 8 9	David Krane	Google Ventures 1600 Amphitheatre Parkway Mountain View, CA 94043	Development and operation of Waymo's autonomous vehicle program; Anthony Levandowski's departure from Waymo; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski; Waymo's business plans; knowledge of discussions with Defendants regarding a partnership with Defendants in the self-driving vehicle/ride-sharing space
11 12 13 14 15 16 17 18 19 20 21 22	David Lu	Google Ventures 1600 Amphitheatre Parkway Mountain View, CA 94043	Development and operation of Waymo's autonomous vehicle program; Anthony Levandowski's departure from Waymo; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski; Waymo's business plans; Waymo's strategy regarding its business model with respect to self-driving car technology; Waymo's business and strategic plans (and plans generally) for the ride-sharing market, including projections for revenue generation and
23 24 25 26			profitability; Waymo's partnerships in the self-driving car space; knowledge of discussions with Defendants regarding a partnership with Defendants in the self-driving vehicle/ride-sharing space
27			

Persons	Address	Knowledge
Larry Page	Alphabet Inc. 1600 Amphitheatre Parkway Mountain View, CA 94043	Development and operation of Waymo's autonomous vehicle program; Anthony Levandowski's departure from Waymo; Waymo's policies surrounding side projects and side businesses knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski; Waymo's business plans; knowledge of discussions with Defendants regarding a partnership with Defendants in the self-driving vehicle/ride-sharing space; knowledge of the Project Chauffeur bonus program;
Sergey Brin	Alphabet Inc. 1600 Amphitheatre Parkway Mountain View, CA 94043	Development and operation of Waymo's autonomous vehicle program; Anthony Levandowski's departure from Waymo; Waymo's policies surrounding side projects and side businesses knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski
Eric Schmidt	Alphabet Inc. 1600 Amphitheatre Parkway Mountain View, CA 94043	Development of Waymo's autonomous vehicle program; Anthony Levandowski's departure from Waymo
David Drummond	Alphabet Inc. 1600 Amphitheatre Parkway Mountain View, CA 94043	Waymo's knowledge of Defendants' autonomous vehicle program; knowledg of Waymo's discussions win Defendants regarding a partnership with Defendant in the self-driving vehicle/ride-sharing space.

1	Persons	Address	Knowledge
2	Chris Urmson		Development and operation of Waymo's autonomous
3			vehicle program; Anthony Levandowski's departure from Waymo; Waymo's
5			employee policies concerning confidential and
6			trade secret information; Waymo's policies
7			surrounding side projects and side businesses; knowledge of Waymo employee
8			involvement in side projects and side businesses, including that of Anthony
10			Levandowski; knowledge of the Project Chauffeur bonus program;
11	Bryan Salesky	Argo AI	Development and operation of Waymo's autonomous
12		40 24th Street Pittsburgh, PA 15222	vehicle program; Anthony Levandowski's departure
13			from Waymo; Waymo's employee policies
14			concerning confidential and trade secret information;
15			Waymo's policies surrounding side projects and
16 17			side businesses; knowledge of Waymo employee
18			involvement in side projects and side businesses,
19			including that of Anthony Levandowski
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Sebastian Thrun Udacity, Inc. 2465 Latham Street Mountain View, CA 94040 Sebastian Thrun Udacity, Inc. 2465 Latham Street Mountain View, CA 94040 Sebastian Thrun Udacity, Inc. 2465 Latham Street Mountain View, CA 94040 Sebastian Thrun Development and operation of Waymo's autonomous vehicle program; Anthony Levandowski's departure from Waymo, knowledge of the Project Chauffeur bonus program; Waymo's policies surrounding side projects and side businesses, including that of Anthony Levandowski of Waymo of Succession of Waymo of Waymo of Succession of Waymo of Succession of Waymo	1	Persons	Address	Knowledge
Dave Ferguson Dave Ferguson Dave Ferguson Dave Ferguson Nuro, Inc. Dave Ferguson Dave Ferguson Nuro, Inc. Dave Ferguson Dave Ferguson Nuro, Inc. Dave Ferguson Dave Ferguson Nuro, Inc. Dave Ferguson Dave Ferguson Nuro, Inc. Development and operation of Waymo's autonomous vehicle program; Anthony Levandowski's departure from Waymo; Waymo's employee policies concerning confidential and trade secret information; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski Dave Population Dave Popula	2 3 4 5 6 7		Udacity, Inc. 2465 Latham Street	Development and operation of Waymo's autonomous vehicle program; Anthony Levandowski's departure from Waymo; knowledge of the Project Chauffeur bonus program; Waymo's employee policies concerning confidential and trade secret information; Waymo's policies surrounding side projects and side businesses; knowledge
12 13 14 15 16 17 18 19 16 17 18 19 19 19 19 19 19 19				involvement in side projects and side businesses, including that of Anthony
Mountain View, CA 94043 Mountain View, CA 94043 Mountain View, CA 94043 Mountain View, CA 94043 Vehicle program; Anthony Levandowski's departure from Waymo; Waymo's employee policies concerning confidential and trade secret information; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski Dave Ferguson Nuro, Inc. 435 N Whisman Road, Suite 100 Mountain View, CA 94043 Development and operation of Waymo's autonomous vehicle program; Anthony Levandowski's departure from Waymo; Waymo's employee policies concerning confidential and trade secret information; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses; including that of Anthony Levandowski Mountain View, CA 94043		Jiajun Zhu		
14 15 16 17 18 19 20 21 22 23 24 25 26 27 27 In In Waynno, Waynno's employee policies concerning confidential and trade secret information; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski Dave Ferguson Nuro, Inc. 435 N Whisman Road, Suite 100 Mountain View, CA 94043 Development and operation of Waymo's autonomous vehicle program; Anthony Levandowski's departure from Waymo; Waymo's employee policies concerning confidential and trade secret information; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski Levandowski Nuro, Inc. 435 N Whisman Road, Suite 100 Mountain View, CA 94043				vehicle program; Anthony
Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski Dave Ferguson Nuro, Inc. 435 N Whisman Road, Suite 100 Mountain View, CA 94043 Development and operation of Waymo's autonomous vehicle program; Anthony Levandowski's departure from Waymo; Waymo's employee policies concerning confidential and trade secret information; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski Maymo's policies concerning confidential and trade secret information; Waymo's policies surrounding side projects and side businesses, including that of Anthony Levandowski				employee policies concerning confidential and
17 18 19 Dave Ferguson Nuro, Inc. 435 N Whisman Road, Suite 100 Mountain View, CA 94043 Development and operation of Waymo's autonomous vehicle program; Anthony Levandowski's departure from Waymo; Waymo's employee policies concerning confidential and trade secret information; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski 26 27				Waymo's policies surrounding side projects and
Dave Ferguson Nuro, Inc. 435 N Whisman Road, Suite 100 Mountain View, CA 94043 Development and operation of Waymo's autonomous vehicle program; Anthony Levandowski's departure from Waymo; Waymo's employee policies concerning confidential and trade secret information; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski				of Waymo employee involvement in side projects
Dave Ferguson Nuro, Inc. 435 N Whisman Road, Suite 100 Mountain View, CA 94043 Development and operation of Waymo's autonomous vehicle program; Anthony Levandowski's departure from Waymo; Waymo's employee policies concerning confidential and trade secret information; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski				including that of Anthony
21 Mountain View, CA 94043 vehicle program; Anthony Levandowski's departure from Waymo; Waymo's employee policies concerning confidential and trade secret information; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski		Dave Ferguson	, and the second	
from Waymo; Waymo's employee policies concerning confidential and trade secret information; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski				vehicle program; Anthony
trade secret information; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski				from Waymo; Waymo's employee policies
surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski	23			trade secret information;
of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski	24			surrounding side projects and
26 and side businesses, including that of Anthony Levandowski	25			of Waymo employee
				and side businesses, including that of Anthony
	28			Ze (wildo (()))

Persons	Address	Knowledge
Kyle Vogt	Cruise Automation 201 11th Street San Francisco, CA 94103	Public disclosure of Waymo's purported trade secrets
Employee of Velodyne LiDAR, Inc.	5521 Hellyer Avenue San Jose, CA 95138 (408) 465-2800	Public disclosure of Waymo's purported trade secrets
Employee of Quanergy Systems, Inc.	482 Mercury Drive Sunnyvale, CA 94085 (408) 245-9500	Public disclosure of Waymo's purported trade secrets
Employee of Cepton Technologies, Inc.	103 Bonaventura Drive San Jose, CA 95134	Public disclosure of Waymo's purported trade secrets
Employee of Innoviz Technologies Ltd.	15 Atir Yeda Street Kfar Saba, Israel 4464312 Email: info@innoviz.tech	Public disclosure of Waymo's purported trade secrets
Employee of Luminar Technologies, Inc.	495 Old Spanish Trail Portola Valley, CA 94028	Public disclosure of Waymo's purported trade secrets
Employee of Toyota Motor Sales, U.S.A., Inc.	19001 South Western Avenue Department WC11 Torrance, CA 90501 (310) 468-5084	Public disclosure of Waymo's purported trade secrets
Employee of Ford Motor Company	One American Road Dearborn, MI 48126 (313) 322-3000	Public disclosure of Waymo's purported trade secrets
Employee of BMW of North America, LLC	300 Chestnut Ridge Road Woodcliff Lake, NJ 07677-7731	Public disclosure of Waymo's purported trade secrets
Employee of Leddartech USA Inc.	1209 N. Orange Street Wilmington, DE 19801-1120	Public disclosure of Waymo's purported trade secrets
Employee of Phantom Intelligence Inc.	2740, Rue Einstein Québec, QC G1P 4S4 Canada (418) 650-6518	Public disclosure of Waymo's purported trade secrets
Employee of DENSO International America	24777 Denso Drive Southfield, MI 48086 (248) 350-7500	Public disclosure of Waymo's purported trade secrets
Employee of Continental Automotive, Inc.	18030 MacMillan Park Drive Fort Mill, SC 29707 (704) 583-8710	Public disclosure of Waymo's purported trade secrets

1	Persons	Address	Knowledge
2 3	Employee of Valeo Inc.	150 Stephenson Highway Troy, MI 48083 (248) 619-8300	Public disclosure of Waymo's purported trade secrets
4	Employee of Suteng Innovation	Robosense Building, Block 1 South of Zhongguan Honghualing	Public disclosure of Waymo's purported trade
5	Technology Co., Ltd.	Industrial District No. 1213 Liuxian Avenue	secrets
6 7		Taoyuan Street, Nanshan District Shenzhen, China	
8		Phone: 400 6325830 / 0755-86325830 Email: Service@sz-sti.com	
9 10 11 12			Public disclosure of Waymo's purported trade secrets; communications and business transactions with Waymo or Defendants regarding the manufacture of the FAC lens; manufacture,
13			availability, and use of FAC lenses
14 15			Public disclosure of Waymo's purported trade secrets; communications and business transactions with
16 17 18			Waymo or Defendants regarding the manufacture of the FAC lens; manufacture, availability, and use of FAC lenses; use and position of
19			laser diodes on printed circuit boards
20	Employee of Gorilla Circuits	Gorilla Circuits c/o CT Corporation	Communications and business transactions with
21 22		818 W. 7th Street, Suite 930 Los Angeles, CA 90017	Waymo or Defendants regarding components for LiDAR sensors; manufacture, availability, and use of such components
23			and use of such components
24			
25			
26			
27			
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Persons	Address	Knowledge
Employee of Lyft, Inc.	185 Berry Street, Suite 500 San Francisco, CA 94107	Waymo's business plans; Waymo's strategy regarding its business model with respect to self-driving car technology; Waymo's partnerships in the self- driving car space; Waymo's business and strategic plans (and plans generally) for the ride-sharing market, including projections for revenue generation and profitability
John Gardner	c/o Rogers Joseph O'Donnell 311 California Street, 10th Floor San Francisco, CA	Representation of Anthony Levandowski; knowledge of Odin Wave LLC, Tyto
		LiDAR LLC, and Sandstone Group LLC; Stroz due diligence for the
		Uber/Ottomotto acquisition
Alisa Baker	Levine & Baker 340 Pine St Suite 300,	Representation of Lior Ron knowledge of Odin Wave LLC, Tyto
	San Francisco, CA 94104	LiDAR LLC, and Sandston Group LLC; Stroz due diligence for the Uber/Ottomotto acquisition
Jordan Jaffe†	Quinn Emanuel Urquhart & Sullivan, LLP	Inspection pursuant to the Court's provisional remedy
	50 California Street, 22nd Floor San Francisco, California 94111	order
	Phone: (415) 875-6600	
Felipe Corredor†	Quinn Emanuel Urquhart & Sullivan, LLP	Inspection pursuant to the Court's provisional remedy
	50 California Street, 22nd Floor	order
	San Francisco, California 94111 Phone: (415) 875-6600	
Jeff Nardinelli†	Quinn Emanuel Urquhart & Sullivan, LLP	Inspection pursuant to the Court's provisional remedy
	50 California Street, 22nd Floor San Francisco, California 94111 Phone: (415) 875-6600	order

1	Persons	Address
2	John McCauley†	Quinn Emanuel Urquhart & Sullivan, LLP
3		50 California Street, 22nd Floor
4		San Francisco, California 94111 Phone: (415) 875-6600
5	Jared Newton†	Quinn Emanuel Urquhart & Sullivan, LLP
6		777 6th Street NW, 11th floor
7		Washington, D.C. 20001 Phone: (202) 538-8000

Defendants believe that Waymo's current and former employees and consultants are likely to have knowledge of: (1) the design and development of Waymo's LiDAR and purported trade secrets, including but not limited to failures to protect the confidentiality of such purported trade secrets; (2) the '922, '464, and '936 patents ("the Asserted Patents"); (3) Waymo's analyses or plans concerning the ride-sharing market, including projections for revenue generation and profitability; (4) Waymo's delay in bringing this lawsuit and motivations for litigating against Defendants; (5) Waymo's practice of allowing competing side businesses; and (6) lack of damages or irreparable harm to Waymo. The identities of all such individuals are known to Waymo but not to Defendants as of the date of this disclosure.³ Defendants reserve the right to supplement this list as additional facts are disclosed in discovery.

Further, Defendants identify the following persons who may have knowledge of facts relevant to this suit:

- 1. Any custodian of records or other person who may be required to establish authenticity of documents;
- 2. Any and all persons identified by Waymo in its initial disclosures; and

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Knowledge

Inspection pursuant to the Court's provisional remedy

Inspection pursuant to the Court's provisional remedy

order

order

²⁵ 26 27

³ As set forth in Defendants' motion to compel (Dkt. 687), Waymo has refused to respond to interrogatories or produce documents fundamental to Defendants' defenses, which Uber needs to proceed with depositions. To date, Waymo has produced only 975 documents in response to Defendants' first and second sets of requests for production, consisting of 162 document requests. If and when Waymo fulfills its interrogatory response and document production obligations, Defendants will supplement these disclosures based on information not currently known to Defendants.

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3. Any and all persons whose depositions are taken, who provide written testimony in this action, or who contribute to any response to the parties' discovery requests.

Additionally, Defendants have retained and intend to retain expert witnesses to testify on its defenses, including non-misappropriation of Waymo's alleged trade secrets; the culture, customs, and practices in the autonomous vehicle space; non-infringement; invalidity; forensic investigations to locate the allegedly downloaded files; and lack of damages.

B. DOCUMENTS, ELECTRONICALLY STORED INFORMATION, AND TANGIBLE THINGS [Fed. R. Civ. P. 26(a)(1)(A)(ii)]

Defendants identify the following categories of documents, electronically stored information, and tangible things in its possession, custody, or control that it may use to support its defenses, unless solely for impeachment:

- Documents concerning Defendants' autonomous vehicle program;
- Documents concerning Defendants' design and development of LiDAR;
- Documents concerning Defendants' efforts to commercialize autonomous vehicle technology;
- Drawings or photographs of Defendants' LiDAR;
- Prototypes (or components of prototypes) of Defendants' LiDAR;
- Documents concerning Defendants' hiring process, including hiring agreements;
- Documents concerning Uber's acquisition of Ottomotto;
- The Asserted Patents, their prosecution histories, and prior art to the Asserted Patents;
- Documents in the public domain relating to Waymo's purported trade secrets;
- Documents concerning third-party suppliers of LiDAR components; and
- Waymo's filings, submissions, applications, or certifications made to public entities pertaining to the use of lasers in autonomous vehicles.

To the extent the above-identified documents are within the possession, custody, or control of Defendants, such documents are generally located at Defendants' offices at 1455 Market Street, San Francisco, CA 94103.

Defendants' search for documents is ongoing, and Defendants reserve the right to

1 supplement this disclosure under Federal Rule of Civil Procedure 26(e)(1). Defendants may also 2 rely on documents produced by any party and third party to this litigation, including Defendants 3 themselves and Waymo. 4 Defendants reserve the right to object to the production of any documents described herein 5 on any basis permitted by the Federal Rules of Civil Procedure. 6 C. COMPUTATION OF DAMAGES [Fed. R. Civ. P. 26(a)(1)(A)(iii)] 7 Pursuant to Fed. R. Civ. P. 26(a)(1)(C), Defendants may seek attorneys' fees and costs in 8 defending this action, but are unable at this time to estimate the amount. 9 D. **INSURANCE AGREEMENTS** [Fed. R. Civ. P. 26(a)(1)(A)(iv)] 10 Defendants are currently unaware of any insurance contracts applicable to any claim in this action. 11 12 **CERTIFICATION** 13 To the best of my knowledge, information and belief, formed after an inquiry that is reasonable under the circumstances, this disclosure is complete and correct as of the date set forth 14 below. 15 16 17 Dated: June 21, 2017 MORRISON & FOERSTER LLP 18 By: /s/ Michael A. Jacobs 19 MICHAEL A. JACOBS 20 Attorneys for Defendants UBER TECHNOLOGIES, INC. 21 and OTTOMOTTO LLC 22 23 24 25 26 27 28